AR 201-12719

bobv@datasync.com on 08/29/2000 10:31:43 AM

To: richard.balcomb@cibasc.com, Rtk Chem/DC/USEPA/US, ChemRTK HPV/DC/USEPA/US, NCIC OPPT/DC/USEPA/US

cc:

Subject: Please Refer to Attached Comments on Irgonox 1010



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EPA--Please Respond

- att1.htm

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Return-path: bobv@datasync.com
Received: by mail (mbox bobv) (with Cubic Circle's cucipop (v1.311998/05/13) Tue Aug 29 09:11:51 2000)
Received: from newmail.datasync.com (root@newmail.datasync.com [205.216.82.35]) by mx.datasync.com (8.8.8/Datasync) with ESMTP id JAA11950 for <bobv@datasync.com>; Tue, 29 Aug 2000 09:11:30 -0500
Received: from eileenv.datasync.com (msp1-1-180.datasync.com [208.164.157.180]) by newmail.datasync.com (8.9.3/8.9.3+Datasync) with SMTP id JAA26923; Tue, 29 Aug 2000 09:11:26 -0500
Date: Tue, 29 Aug 2000 09:01:21 -0500
From: "bobv" <bobv@datasync.com>
Subject: Fw: CAS#6683-19-8--Comments on HPV Submission
To: <Chem.Rtk@epamail.epa.gov>
Message-id: <000c01c01 1c1$9dd7cda0$b49da4d0@datasync.com>
MIME-version: 1.0
X-MIMEOLE: Produced By Microsoft MimeOLE V5.00.2314.1300
X-Mailer: Microsoft Outlook Express 5.00.2314.1300
Content-type: multipart/alternative; boundary="Boundary_(ID_/JS/5ihMN7awhextIFAfrg)"
X-Priority: 3
X-MSMail-priority: Normal
X-From-: bobv@datasync.com Tue Aug 29 09:11:31 2000

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----- Original Message -----
From: bobv
To: Chem.Rtk@epamail.epa.gov
Sent: Monday, August 28, 2000 7:35 PM
Subject: CAS#6683-19-8--Comments

1)Measure,not calculate,basic physical properties as M.P. & B.P.2f is fairly low reliability.
2)Throughout the submission,criteria such as NOEC,NOEL,etc.are set at the highest concentration tested,when a ">" seems more appropriate.
3)State in the conclusions that logPow=23 means it significantly bioaccumulates.
4)Photodegration--given the extremely low VP,it seems meaningless & misleading to use atmospheric conditions that could only be achieved under extreme or artificial conditions.Wouldn't photodeg.on a surface be more appropriate?

5)Given the ~10E-23 solubility in water & -56% present in sediment(Fug.Calc.),shouldn't the H20 Stability Test take this into consideration & express t1/2 in terms that address a more realistic environmental scenario with the test chemical in sediment in contact with H20,at a pH of 6-9?
6)Given log Pow=23,essentially zero biodegradation,essentially zero photodegration under "normal" conditions,shouldn't this chemical be classified as Persistent & Bioaccumulative?If so,more info is needed on chronic effects on a time scale of years,not days or weeks.
7)Acute Aquatic Tox--how are concentrations of 100mg/L achieved when H20 solubility is reported at ~10E-23?
8)Chromosomal Aberration--"spontaneous" abnormality reported & 2e reliability code indicates testing should be redone.

Respectfully submitted,
Robert P.Vignes,Ph.D.
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att2.htm